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MEMO ENDORSED

February 18, 2015

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VIA ECF

The Honorable Valerie Caproni United States District Judge Southern District of New York 40 Foley Square, Courtroom 443 New York, NY 10007

Re:

Securities and Exchange Commission v. Revelation Capital Management, Ltd., and Christopher P.C. Kuchanny, Case No. 14 Civ. 0645

Dear Judge Caproni:

We respectfully submit this letter in the above-referenced action pursuant to Your Honor's Individual Practices to request an adjournment of the discovery deadlines and pre-trial conference date presently scheduled for March 6, 2015. The Securities and Exchange Commission joins in our request.

The parties are in the midst of settlement discussions and a brief adjournment will save the parties significant resources, as discovery in this case will require several letters of request pursuant to Fed. R. Civ. P. 28(b) and approval from authorities both domestic and abroad.

A previous request for an adjournment of time was requested in this matter on October 23, 2014. Below are the current dates in this action, and proposed alternative dates if satisfactory to the Court:

	Current Date	Proposed Date
Fact Discovery Completion (§5(a))	March 5, 2015	June 4, 2015
Next Pretrial Conference (§10)	March 6, 2015	June 5, 2015
Expert Discovery Completion (§5(b))	April 22, 2015	July 22, 2015

Case 1:14-cv-00645-VEC Document 25 Filed 02/19/15 Page 2 of 2

The Honorable Valerie Caproni February 18, 2015 Page 2

We appreciate the Court's consideration in this matter.

Request GRANTED. The deadline for fact discovery is ADJOURNED to June 4, 2015. The deadline for expert discovery is ADJOURNED to July 22, 2015. The conference scheduled for March 6, 2015, is ADJOURNED to June 5, 2015, at 10:00 a.m. No further adjournments shall be granted.

SO ORDERED.

HON. VALERIE CAPRONI

UNITED STATES DISTRICT JUDGE

February 19, 2015

Respectfully submitted,

SEWARD & KISSEL LLP Attorneys for Defendants

Bv.

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U.S. Securities and Exchange Commission

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